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Attorneys for Defendant and
Counterclaimant MONOPRICE, INC.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

KREATIVE POWER, LLC, a California limited
liability company,

Plaintiff and Counterdefendant,

v.

MONOPRICE, INC., a California corporation,
Defendant and Counterclaimant.

Civil Action No. 3:14-02991-SI

Judge Susan Illston

**DECLARATION OF JOHN B.
SGANGA IN SUPPORT OF
MONOPRICE, INC.'S MOTION
FOR SUMMARY JUDGMENT OF
NONINFRINGEMENT AND
INVALIDITY**

Date: February 13, 2015

Time: 9:00 a.m.

Courtroom 10, 19th Floor

1 I, John B. Sganga, declare and state as follows:

2 I am a partner in the law firm of Knobbe, Martens, Olson & Bear, LLP, and I am
3 counsel of record for Monoprice, Inc. ("Monoprice") in this action. I submit this Declaration
4 in Support of Monoprice's Motion for Summary Judgment of Noninfringement and
5 Invalidity. The following statement is based on my personal knowledge.

6 1. Attached hereto as Exhibit A is a true and correct copy of U.S. Patent No.
7 7,112,097, entitled "Compact Electrical Power Outlet System" ("the '097 patent"), issued on
8 September 26, 2006.

9 2. Attached hereto as Exhibit B is a true and correct copy of the file history for
10 the '097 patent that Kreative produced with its infringement contentions.

11 3. Attached hereto as Exhibit C is a true and correct copy of U.S. Patent No.
12 D653,215, entitled "Surge Protector With USB Charging Port" ("the '215 patent"), issued on
13 January 31, 2012.

14 4. Attached hereto as Exhibit D is a true and correct copy of copyright
15 registration No. VA 0001908609, the copyright asserted by Kreative.

16 5. Attached hereto as Exhibit E is a true and correct copy of Plaintiff's
17 Disclosure of Asserted Claims and Infringement Contentions, dated October 31, 2014.

18 6. Attached hereto as Exhibit F is a true and correct copy of a PowerPoint slide
19 deck titled "Chronology of POWRAMID," dated May 2014 and produced by Plaintiff as
20 KP00015-KP00029 on October 31, 2014.

21 7. Attached hereto as Exhibit G is a true and correct copy of the Merriam
22 Webster website's definition entry for the word "circular."

23 8. Attached hereto as Exhibit H is a true and correct copy of a January 2, 2008,
24 press release found at the webpage [http://www.prnewswire.com/news-releases/kreative-](http://www.prnewswire.com/news-releases/kreative-power-unleashes-powramidtm-56760447.html)
25 [power-unleashes-powramidtm-56760447.html](http://www.prnewswire.com/news-releases/kreative-power-unleashes-powramidtm-56760447.html).

26 I declare under penalty of perjury under the laws of the United States of America that
27 the foregoing is true and correct.

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1 Executed on December 29, 2014 in Irvine, California.

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3
4 s/John B. Sganga, Jr.
John B. Sganga, Jr.

CERTIFICATE OF CM/ECF SERVICE

I hereby certify that on December 30, 2014, I caused the **DECLARATION OF JOHN B. SGANGA IN SUPPORT OF MONOPRICE, INC.'S MOTION FOR SUMMARY JUDGMENT OF NONINFRINGEMENT AND INVALIDITY** to be electronically filed with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to all attorneys of record.

I certify and declare under penalty of perjury under the laws of the State of California that I am employed in the office of a member of the bar of this Court at whose direction the service was made, and that the forgoing is true and correct.

Executed on December 30, 2014, at San Diego, California.


Colleen Mensching

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